



Rob_J_Hartman@astaris.com

01/18/02 12:22 PM

To: Linda Meyer/R10/USEPA/US@EPA
cc:

Subject: Re: Question on Pond 17 closure plan

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Linda: Summary answers to your questions regarding the Pond 17 closure plan:

1. The primary LCRS is the "landfill" leachate collection system above the primary liner that was installed for this unit when constructed for use as a landfill (the "NOSAP landfill"). The LCRS was plugged prior to conversion of the unit for use as a surface impoundment (Pond 17). The closure plan includes permanent plugging of the LCRS. This action on the LCRS is not to be confused with the LCDRS between the primary and secondary liners that will be maintained and monitored during the closure and post-closure periods.

2. Suggested approach for documentation in the event that construction of the initial fill and temporary cover cannot be completed during the first construction season: "In the event that construction of the initial fill and temporary cover cannot be completed during the first construction season, FMC will submit to EPA a report describing the work that was completed and a description and tentative schedule for the remaining work necessary to complete the initial fill and temporary cover as early as practicable during the next construction season."

3. Based on our experience with Pond 8E (most comparable unit to Pond 17), the initial fill reduces phosphine emissions to the extent that phosphine concentrations in the area of the pond are well below the 0.3 ppm 8-hour TWA PEL. There have been no reports of exceeding 0.3 ppm phosphine (personal monitors, i.e., Draeger Pac III) from pond chiefs, surveyors, groundwater monitoring personnel or environmental staff working in the area of Pond 8E since the initial fill phase was completed. Based on our experience, after the initial fill is completed at Pond 17 there is a low probability that the FTIR "alarm" level for phosphine would ever be triggered.

We are currently preparing the plan for monitoring the temporary gas collection system that will be installed under the temporary cover at Pond 18 Cell A per EPA's approval letter dated January 2, 2002. The plan we are currently developing includes phosphine monitoring along the perimeter of the unit using portable monitoring equipment. It seems appropriate that the plan for Pond 18 Cell A would also be applicable to the temporary gas collection system that will be installed under the temporary cover at Pond 17. The monitoring that we are currently proposing would provide relevant information regarding phosphine concentrations along the perimeter of the pond similar to the FTIRs albeit not on a continuous basis.

In addition, we expect emissions to decrease now that the pond is not in service and continue to collect FTIR data at Pond 17 per the PMP. It may be appropriate to defer a final decision on post-initial fill phosphine monitoring until we can review the 1Q02 FTIR data for Pond 17. If the FTIR alarm level is not exceeded while the pond is not in service prior to initiation of initial fill, it is inconceivable that the FTIR alarm level would be exceeded when the pond is covered with 7 to 15 feet of fill.

Contact me next week when you are back in your office to discuss further.

Meyer.Linda@epamail.epa.gov
To: Rob_J_Hartman@astaris.com
cc:

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01/11/02 05:54 PM

Subject: Question on Pond 17 closure plan


Rob - section 8.9 of the pond 17 closure plan states the unit's primary LCRS will be capped and sealed (as indicated earlier in this section). I didn't notice this when I looked at this plan earlier. I can't find where this is mentioned in other sections of the closure plan, and I don't understand why this is being proposed - can you help? Second for the case that the HDPE is not installed in 2002 but delayed to 2003- Cathy suggested and I agree that we should get some sort of report which documents the conditions/work that will need to be conducted prior to the interim HDPE cover installation. Seems like something you would need to do anyway to have the contractor do the work - can you help with this paragraph of the letter so this requirement isn't extra work - warning this is a draft letter - and the requirement for FTIR is a place holder so I don't forget, well who knows the whole letter may be a place holder if the Tribes have their way!

(See attached file: phas1pond17cover_dft.wpd)

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(See attached file: phas1pond17cover_dft.wpd)

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